

Mr. Eric Gillies
 July 31, 2006
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3. An EIR shall describe feasible measures which could minimize significant adverse impacts (CEQA Guidelines §15126.4(a)(1)). Mitigation measures for project impacts to sensitive plants, animals, and habitats should emphasize evaluation and selection of alternatives which avoid or otherwise minimize impacts. Compensation for unavoidable impacts through acquisition and protection of high quality habitat elsewhere should be addressed.
 - a. The Department considers Rare Natural Communities as threatened habitats having both regional and local significance. Thus, these communities should be fully avoided and otherwise protected from project-related impacts. The List of California Terrestrial Natural Communities is available on request or may be viewed and downloaded online by visiting the Department's website at http://www.dfg.ca.gov/whdab/html/natural_communities.html.
 - b. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Department studies have shown that these efforts are experimental in nature and largely unsuccessful.
4. A range of alternatives should be analyzed to ensure that alternatives to the proposed project are fully considered and evaluated. A range of alternatives which avoid or otherwise minimize impacts to sensitive biological resources including wetlands/riparian habitats, alluvial scrub, coastal sage scrub, native woodlands, etc. should be included. Specific alternative locations should also be evaluated in areas with lower resource sensitivity where appropriate.
5. A California Endangered Species Act (CESA) Permit must be obtained, if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to the proposed project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit. For these reasons, the following information is requested:
 - a. Biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit.
 - b. A Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.
6. The Department opposes the elimination of watercourses and/or their channelization or conversion to subsurface drains. All wetlands and watercourses, whether intermittent,

4-03

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4-06

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ephemeral, or perennial, must be retained and provided with substantial setbacks which preserve the riparian and aquatic habitat values and maintain their value to on-site and off-site wildlife populations.

- a. The Department requires a streambed alteration agreement, pursuant to Section 1600 et seq. of the Fish and Game Code, with the applicant prior to any direct or indirect impact to a lake or stream bed, bank or channel or associated riparian resources. The Department's issuance of a stream bed alteration agreement may be a project that is subject to CEQA. To facilitate our issuance of the agreement when CEQA applies, the Department as a responsible agency under CEQA may consider the local jurisdiction's (lead agency) document for the project. To minimize additional requirements by the Department under CEQA the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. Early consultation is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources.

4-06 cont

Marine Environment

The Department is concerned about project impacts to marine hard-bottom habitat (rocky substrate) and its associated communities. Hard-bottom areas are considered a valuable marine resource as they provide habitat for a diverse group of marine organisms. Impacts to hard-bottom substrate should be avoided and/or minimized by routing cables and pipelines where hard-bottom substrate does not occur and by not anchoring over hard-bottom areas during installation, construction, and repair activities. Any impacts to hard-bottom habitat will need to be fully mitigated in the form of replacement habitat.

4-07

We are also concerned about increased artificial night lighting. Artificial lighting generally threatens wildlife by disrupting biological rhythms and otherwise interfering with the behavior of nocturnal animals. The Xantus's murrelet is a state-listed threatened species that may occur in the project area. Xantus's murrelets are known to be attracted to bright light sources, particularly on dark, foggy nights. This may cause them to crash into lighted objects, which can result in direct mortality or they fall stunned and/or injured into the water or land on decks. Injured birds become easy targets for predation from gulls after daylight. Increased lighting, during the construction phase or additional lighting on Platform Holly, and its impacts on Xantus's murrelets should be addressed in the DEIR.

4-08

The DEIR should discuss commercial and recreational fishing in the project vicinity, including the cable and pipeline routes, and consider how the proposed project would affect fishing activities and resources. Adverse impacts to commercial and/or recreational fishing activities within the project area could result from the loss of accessible fishing areas during construction operations; the permanent loss of available seafloor from additional exposed pipelines, increased vessel traffic, and oil spills from project vessels, both in the construction and operational phases.

4-09

Activities on the beach (e.g. trenching, water pipeline repair) could impact California

4-10

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grunion, a recreational and ecologically important nearshore fish species. Grunion spawn on the beach, from March to August, during the highest tides of the month. Beach activities should be timed to avoid impacts to spawning, incubating, or hatching grunion.

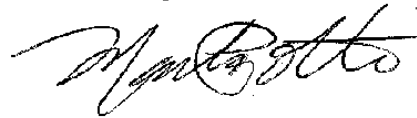
4-10 cont.

The DEIR will need to include, at a minimum, a hard-bottom avoidance plan, a marine mammal, sea turtle, and seabird protection plan, an oil spill contingency plan, a notice to fishermen, and a sea bottom cleanup plan.

4-11

The Department suggests a pre-project or early consultation planning meeting for all projects. For terrestrial issues, please call Martin Potter, Wildlife Biologist, at (805) 640-3677. For marine issues, please call Marilyn Fluharty, Staff Environmental Scientist, at (858) 467-4231. Thank you for this opportunity to provide comment.

Sincerely,



For Larry L. Eng, Ph.D.
Regional Manager
South Coast Region

attachment

cc: Ms. Marilyn Fluharty
Department of Fish and Game
San Diego, California

Mr. Martin Potter
Department of Fish and Game
Ojai, California

Mr. Scott Morgan
State Clearinghouse
Sacramento, California

Guidelines for Assessing the Effects of Proposed Projects on Rare, Threatened, and Endangered Plants and Natural Communities

State of California
THE RESOURCES AGENCY
Department of Fish and Game
December 9, 1983
Revised May 8, 2000

The following recommendations are intended to help those who prepare and review environmental documents determine **when** a botanical survey is needed, **who** should be considered qualified to conduct such surveys, **how** field surveys should be conducted, and **what** information should be contained in the survey report. The Department may recommend that lead agencies not accept the results of surveys that are not conducted according to these guidelines.

1. Botanical surveys are conducted in order to determine the environmental effects of proposed projects on all rare, threatened, and endangered plants and plant communities. Rare, threatened, and endangered plants are not necessarily limited to those species which have been "listed" by state and federal agencies but should include any species that, based on all available data, can be shown to be rare, threatened, and/or endangered under the following definitions:

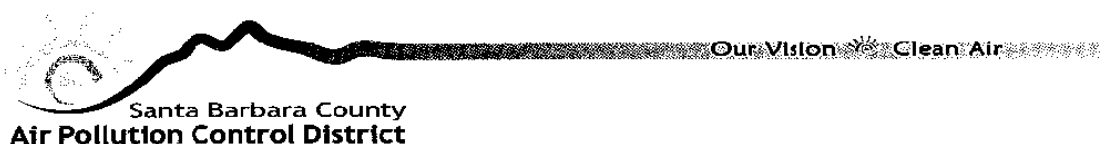
A species, subspecies, or variety of plant is "endangered" when the prospects of its survival and reproduction are in immediate jeopardy from one or more causes, including loss of habitat, change in habitat, over-exploitation, predation, competition, or disease. A plant is "threatened" when it is likely to become endangered in the foreseeable future in the absence of protection measures. A plant is "rare" when, although not presently threatened with extinction, the species, subspecies, or variety is found in such small numbers throughout its range that it may be endangered if its environment worsens.

Rare natural communities are those communities that are of highly limited distribution. These communities may or may not contain rare, threatened, or endangered species. The most current version of the California Natural Diversity Database's List of California Terrestrial Natural Communities may be used as a guide to the names and status of communities.

2. It is appropriate to conduct a botanical field survey to determine if, or to the extent that, rare, threatened, or endangered plants will be affected by a proposed project when:
 - a. Natural vegetation occurs on the site, it is unknown if rare, threatened, or endangered plants or habitats occur on the site, and the project has the potential for direct or indirect effects on vegetation; or
 - b. Rare plants have historically been identified on the project site, but adequate information for impact assessment is lacking.
3. Botanical consultants should possess the following qualifications:
 - a. Experience conducting floristic field surveys;
 - b. Knowledge of plant taxonomy and plant community ecology;
 - c. Familiarity with the plants of the area, including rare, threatened, and endangered species;
 - d. Familiarity with the appropriate state and federal statutes related to plants and plant collecting; and,
 - e. Experience with analyzing impacts of development on native plant species and communities.
4. Field surveys should be conducted in a manner that will locate any rare, threatened, or endangered species that may be present. Specifically, rare, threatened, or endangered plant surveys should be:
 - a. Conducted in the field at the proper time of year when rare, threatened, or endangered species are both evident and identifiable. Usually, this is when the plants are flowering.

When rare, threatened, or endangered plants are known to occur in the type(s) of habitat present in the project area, nearby accessible occurrences of the plants (reference sites) should be observed to determine that the species are identifiable at the time of the survey.

- b. Floristic in nature. A floristic survey requires that every plant observed be identified to the extent necessary to determine its rarity and listing status. In addition, a sufficient number of visits spaced throughout the growing season are necessary to accurately determine what plants exist on the site. In order to properly characterize the site and document the completeness of the survey, a complete list of plants observed on the site should be included in every botanical survey report.
 - c. Conducted in a manner that is consistent with conservation ethics. Collections (voucher specimens) of rare, threatened, or endangered species, or suspected rare, threatened, or endangered species should be made only when such actions would not jeopardize the continued existence of the population and in accordance with applicable state and federal permit requirements. A collecting permit from the Habitat Conservation Planning Branch of DFG is required for collection of state-listed plant species. Voucher specimens should be deposited at recognized public herbaria for future reference. Photography should be used to document plant identification and habitat whenever possible, but especially when the population cannot withstand collection of voucher specimens.
 - d. Conducted using systematic field techniques in all habitats of the site to ensure a thorough coverage of potential impact areas.
 - e. Well documented. When a rare, threatened, or endangered plant (or rare plant community) is located, a California Native Species (or Community) Field Survey Form or equivalent written form, accompanied by a copy of the appropriate portion of a 7.5 minute topographic map with the occurrence mapped, should be completed and submitted to the Natural Diversity Database. Locations may be best documented using global positioning systems (GPS) and presented in map and digital forms as these tools become more accessible.
5. Reports of botanical field surveys should be included in or with environmental assessments, negative declarations and mitigated negative declarations, Timber Harvesting Plans (THPs), EIR's, and EIS's, and should contain the following information:
- a. Project description, including a detailed map of the project location and study area.
 - b. A written description of biological setting referencing the community nomenclature used and a vegetation map.
 - c. Detailed description of survey methodology.
 - d. Dates of field surveys and total person-hours spent on field surveys.
 - e. Results of field survey including detailed maps and specific location data for each plant population found. Investigators are encouraged to provide GPS data and maps documenting population boundaries.
 - f. An assessment of potential impacts. This should include a map showing the distribution of plants in relation to proposed activities.
 - g. Discussion of the significance of rare, threatened, or endangered plant populations in the project area considering nearby populations and total species distribution.
 - h. Recommended measures to avoid impacts.
 - i. A list of all plants observed on the project area. Plants should be identified to the taxonomic level necessary to determine whether or not they are rare, threatened or endangered.
 - j. Description of reference site(s) visited and phenological development of rare, threatened, or endangered plant(s).
 - k. Copies of all California Native Species Field Survey Forms or Natural Community Field Survey Forms.
 - l. Name of field investigator(s).
 - j. References cited, persons contacted, herbaria visited, and the location of voucher specimens.



July 25, 2006

Eric Gillies, Staff Environmental Scientist
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

SUBJECT: Venoco Ellwood Oil Development and Pipeline Project: Notice of Preparation (CSLC EIR No. 738, CSLC Ref Files: W30119, W40912)

Dear Mr. Gillies:

The Santa Barbara County Air Pollution Control District (APCD) appreciates the opportunity to provide comments on the NOP for the above-mentioned project. The SBCAPCD as a responsible agency under CEQA will use the California State Lands Commission (CSLC) environmental document to issue the APCD Authority to Construct (ATC) permit. We have the following comments on the air quality analysis in the proposed Environmental Impact Report (EIR):

Comments on Significance Criteria:

1. The APCD recommends some updates to the CSLC air quality significance criteria provided on Page 19 of the Attachment.

- a) The APCD no longer considers localized Carbon Monoxide (CO) hotspots a potential impact because the County has been in attainment of the state CO standard for many years and ambient CO levels have declined significantly.
- b) The APCD also recommends that only daily emission thresholds be used and that the CSLC drop the use of annual thresholds as significance criteria in environmental documents for projects in Santa Barbara County. We have never used 15 tons per year of ROG, NOx or PM10 as significance criteria.
- c) Please add the following Health Risk significance thresholds :

	<u>Significance Threshold</u>
Cancer risk:	≥ 10/million
Chronic non-cancer risk:	≥ 1
Acute non-cancer risk:	≥ 1

5-01

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5-03

Terence E. Dressler - Air Pollution Control Officer
260 North San Antonio Road, Suite A • Santa Barbara, CA • 93110 • www.sbapcd.org • 805.961.8800 • 805.961.8801 (fax)

Venoco Ellwood Oil Development and Pipeline Project NOP
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Comments on Demolition and Construction of Proposed Project:

2. While the APCD has an exemption for internal combustion engines used in construction activities, there is no exemption in our rules for diesel engines over 50 horsepower used in demolition or de-construction projects. We have identified three activities/projects in the application that could be subject to APCD permit:
 - Ellwood Marine Terminal Demolition (should include Line 96)
 - Removal of sub sea power cable between Ellwood Onshore Facility and Platform Holly
 - Partial dismantling of Ellwood Onshore Facility components
3. For the APCD to rely on the lead agency documents for CEQA purposes, demolition activities and associated emissions will need to be broken out separately from construction emissions.
4. Emissions from any marine vessels used in demolition activities should also be detailed.
5. Controlled emission factors (EPA Tier 1 or 2) were assumed for a large number of diesel construction engines, and emissions were calculated based on these factors. It is conceivable that if the actual fleet mix has significantly less EPA Tier 1 engines, then total NOx emissions could exceed 25 tons in 12 month. This could trigger offsets per APCD Rule 202.F.3.
6. We expect the contractor will perform any required health risk assessment of construction activities. As a responsible agency, the APCD would rely on this analysis. Although Venoco has clarified in their application response that the proposed project throughputs will be 13 MMSCF of gas per day and 20,000 barrels oil per day, we note that Venoco has not provided a maximum daily emissions scenario for an impact analysis, and this will have to be developed to perform a risk assessment or impact modeling (also see Comment 13 below).
7. In their resubmittal, Venoco changed the basis for estimating construction emissions. They moved away from load factor assumptions, and instead assumed actual fuel use from two past pipeline construction projects in Southern California. They also applied emission factors in 'lb/1000 gallon' units. The APCD has not verified the fuel assumptions or the revised construction emission assumptions, and this should be done in the EIR process.

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8. To determine if offsets or an air quality impact assessment is required for the construction activities per APCD Rule 202.F.3, all engine emissions associated with construction, including mobile source emissions, need to be isolated from the demolition emissions. Since the Marine Terminal abandonment emissions do not qualify as construction emissions, construction emissions need to be broken out for the Venoco Ellwood stationary source to evaluate whether the 25 tons per year (a rolling 12 month calculation) offset threshold is exceeded.

5-10

Comments on Operation of Proposed Project

9. Purging and degassing of pipelines and tanks will need to comply with APCD Rules 343 and 325. Any degassing and purging operations should be detailed in the EIR, along with a discussion of how they comply with APCD rules. In addition, if portable degassing equipment is proposed, existing APCD permitted portable units should be used or new units must be permitted prior to use.

5-11

10. Venoco asserts all new wells will be drilled through existing well slots, and thus any emissions increases would qualify as *de minimis*. It does not appear Venoco quantified these emissions, and these should be further evaluated. We note that Venoco's current stationary source *de minimis* ROC emissions total is 22.3 lb/day, so any *de-minimis* changes are limited to 1.7 lb/day before an APCD permit would be required.

5-12

11. The Lo-Cat oxidizer air has been linked to potential odors in the past, and an odor abatement system is required in APCD permits to minimize the potential for odors. The current odor abatement configuration routes the Lo-Cat gas stream to the thermal oxidizers, and with a required minimum combustion temperature (1400 degrees F) to ensure destruction of residual organic compounds. As indicated in this section, the proposed project would re-route Lo Cat oxidizer air to the combustion air intake of the generator engines. Per section 4.4.2 and permit condition 9.C.2.b of APCD Permit to Operate number 7904-06, Best Available Control Technology operations that result in reactive organic compounds and benzene destruction efficiency of 98.5 percent is required. This minimum 98.5 percent destruction efficiency requirement would apply to the proposed project. The proposed re-routing would not be permissible unless a detailed engineering analysis was performed to demonstrate that required destruction efficiency could be achieved. The EIR must include this detailed analysis and determine if the Ellwood Onshore Facility upgrade project construction would have to be revised. *Note: Venoco responded that they intend to meet BACT requirements for all applicable pollutants. Based on the information in the application, it appears NOx will be subject to BACT.*

5-13

Venoco Ellwood Oil Development and Pipeline Project NOP

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12. Venoco has committed not to use anhydrous ammonia. The land use permit should be conditioned accordingly. **5-14**

13. Venoco has stated that the new 20 million BTU/hr oil heater is actually a waste heat exchanger, recovering heat from the power generators; thus no emissions from it will occur. However, it is still not clear how oil processing can continue (as Venoco indicates in their response) if the generator engines go down. This needs to be evaluated in the EIR. **5-15**

14. Venoco has revised estimated emissions based on its current PTO 7904-R7 for the Ellwood facility. The actual ROC emissions data (2002-2004) is still heavily skewed by inflated 2002 data for fugitive ROC emissions. Our updated information shows actual ROC emissions during 2002-2004 were between 70 and 75 tons per year. **5-16**

15. Venoco has clarified that the three generator engines will not be removed as part of the proposed project, and that they will serve as back-up units. In addition, Venoco notes an existing diesel crane on Holly will be replaced in 2006 with a new crane with EPA tier 3 emission factors. **5-17**

16. A full and complete Health Risk Analysis (HRA) using APCD approved methodologies should be performed on the resulting project. The project should not be approved if it results in a significant cancer or non-cancer impact to the community. The APCD provides the following protocol as applicable:

a) **Baseline Risk:** The Venoco – Ellwood stationary source is subject to the Air Toxics “Hot Spots” Information and Assessment Act of 1987 (AB 2588). In April 2005, the APCD conducted air toxics Health Risk Assessment (HRA) for Reporting Year 2002 for the Venoco Ellwood Oil & Gas Facility, using the Hotspots Analysis and Reporting Program (HARP) software, Version 1.1 (Build 23.02.10). Cancer risk and chronic and acute non-cancer Hazard Index (HI) risk values were calculated and compared to *significance thresholds* for cancer and chronic and acute non-cancer risk adopted by the APCD’s Board of Directors. The calculated risk values and applicable thresholds are as follows:

	<u>Venoco Ellwood Max Risks</u>	<u>Significance Threshold</u>
Cancer risk:	23.6 /million	≥10/million
Chronic non-cancer risk:	0.0522	≥ 1
Acute non-cancer risk:	0.9574	≥ 1

The cancer risk extends off the property boundary approximately 45 meters (see attached footprint). However, the cancer risk isopleths is within their easement and the public does not have access to this area. In addition, the isopleths is in a rugged

vegetation area that the public can not easily access even if they tried entry. As part of the Risk Reduction Audit and Plan, Venoco has agreed to post signs along the easement to ensure the public is kept out of the exposed area. In addition, Venoco began using a diesel fuel additive in 2005 to reduce the diesel particulate matter emissions following identification of those emissions as a risk factor.

5-18 cont.

The cancer risk is primarily due to particulate matter emissions from diesel engines. Diesel exhaust is emitted from three diesel internal combustion engines: an engine used to drive an air compressor, one engine used to drive an emergency firewater pump and an engine used to drive an emergency backup electrical generator.

The Venoco Holly facility is subject to the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588). A health risk assessment (HRA), based on the 2002 toxic emissions inventory, is currently underway and will be completed by the end of this year. The most recent HRA for the facility was prepared by the APCD on October 28, 1993 under the Air Toxics "Hot Spots" program. The HRA was based on 1991 toxic emissions inventory data submitted to the APCD by Mobil, the previous owners of Holly.

Cancer risk and chronic and acute non-cancer Hazard Index (HI) risk values were calculated based on the 1991 inventory and compared to significance thresholds for cancer and chronic and acute non-cancer risk adopted by the APCD's Board of Directors. The calculated risk values and applicable thresholds are as follows:

5-19

	<u>Holly Max Risks</u>	<u>Significance Threshold</u>
Cancer risk:	8.0 /million	>10/million
Chronic non-cancer risk:	0.04	> 1
Acute non-cancer risk:	6.0	> 1

Based on the 1991 toxic emissions inventory, a cancer risk of 8.0 per million was estimated for the Holly facility. The cancer risk is primarily due to emissions of polycyclic aromatic hydrocarbons (PAH) from internal combustion devices (e.g., cranes, crew boat activities). Approximately 2.0 pounds of PAH were emitted from Holly devices in 1991. This risk was determined to occur approximately 3,400 meters northwest of the platform (over the ocean).

A chronic non-cancer hazard risk of 0.04 and an acute hazard risk of 6.0 have been estimated by the APCD. The acute hazard risk is over the APCD's significance threshold of 1. This significant acute hazard index is due to H₂S emissions from fugitive sources.

Venoco Ellwood Oil Development and Pipeline Project NOP
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b) **Project Risk Assessment:** The APCD recommends that the facility's current health risk status under the Air Toxics "Hot Spots" Program be identified and fully discussed in the EIR. The incremental risk from the proposed project should also be identified. All existing and new toxic emissions sources should be addressed in the analysis. The total projected facility risk (current risk plus incremental risk from the proposed project) should be discussed. If the total projected facility risk is above the APCD's significant risk thresholds, the EIR should identify how the risk will be mitigated below APCD's significant risk thresholds. As mentioned above, the cancer risk from Venoco Ellwood Oil & Gas Facility is 23.6 in a million. Any increase in cancer risk or cancer risk footprint (see attached) from the Venoco Ellwood Oil & Gas Facility will be considered significant and should be mitigated.

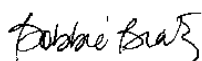
5-20

c) **Health Risk Assessment Procedures:** The health risk assessment should be conducted according to the guidelines set forth by the Office of Environmental Health Hazard Assessment (OEHHA). OEHHA's guidelines may be accessed at: http://www.oehha.ca.gov/air/hot_spots/pdf/HRAguidefinal.pdf. The APCD recommends using the model HARP, Hotspots Analysis Reporting Program, which utilizes OEHHA's guidelines and is available at: <http://www.arb.ca.gov/toxics/harp/harp.htm>. For specific requirements on conducting health risk assessments in Santa Barbara County, please see page 7 of APCD Form -15i (<http://www.sbapcd.org/eng/dl/appforms/apcd-15i.pdf>).

5-21

We look forward to working with you on this important project. If you have questions regarding the comments please call Brian Shafritz, at (805) 961-8823 or e-mail me: BEB@sbapcd.org.

Sincerely,



Bobbie Bratz
 Public Information and Community Programs Supervisor
 Technology and Environmental Review Division

ATTACHMENT

cc: TEA Chron File
 Project File (CSLC Venoco Ellwood Oil Development & Pipeline Project)
 Kevin Drude, Energy Division, P&D
 Ken Curtis, City of Goleta
 Brian Shafritz, SBCAPCD
 Michael Goldman, SBCAPCD
 Robin Cobbs, SBCAPCD

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VENOCO ELLWOOD ONSHORE FACILITY



5-22

10 in a million Cancer Risk Footprint for Reporting Year 2002

Legend:

- Red Line (*thick black line*) = property boundary of Venoco Ellwood Oil & Gas Facility
- Orange Line (*thin white line*) = 10 in a million cancer footprint



**Ventura County
Air Pollution
Control District**

669 County Square Drive
Ventura, California 93003

tel 805/645-1400
fax 805/645-1444
www.vcapcd.org

**Michael Villagas
Air Pollution Control Officer**

July 31, 2006

Eric Gillies
Staff Environmental Scientist
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

Subject: Request for Review of the Notice of Preparation for an Environmental Impact Report for Development of Oil and Gas Production on Leases PRC 3120.1 and 3242.1 from Platform Holly, a New Onshore Pipeline and Decommissioning Ellwood Marine Terminal

Dear Mr. Gillies:

Ventura County Air Pollution Control District staff has reviewed the subject notice of preparation for an environmental impact report (EIR). The project consists of a proposal to extend the oil and gas lease boundaries of PRC 3120.1 and 3242.1 to fully develop the oil reserves, provide for safety improvements and upgrades at the existing Ellwood Onshore Facility (EOF), and eliminate all operations at the Ellwood Marine Terminal (EMT) by the installation of a new onshore pipeline route system. Components of the proposed project include expansion of oil and gas reserves from Platform Holly, drill up to 40 new wells from Platform Holly; several upgrades and safety improvements to the EOF; a new pipeline that would take existing and expanded oil produced from Platform Holly and treated at the EOF to the All American Pipeline Limited Partnership's Coastal Pipeline located at Las Flores Canyon; and, decommissioning the existing Ellwood Marine Oil Terminal since it would be replaced by the new pipeline delivery system. The project location is Lease PRC 3120.1 and 3242.1, which includes Platform Holly on State tide and submerged lands off the Coast of Santa Barbara County near Goleta. Ellwood oil and gas onshore facilities include property adjacent to the Sandpiper golf course; UC Santa Barbara leased lands near Ocean Meadows Golf Course and a proposed pipeline corridor along State Route 101 to Las Flores Canyon.

General Comments

District staff recommends the draft EIR evaluate all potential air emissions that may occur in or affect Ventura County from the proposed project. This assessment should include an analysis of short-term and operational impacts from all onsite equipment, all project-related motor vehicles and marine vessels transiting Ventura County waters, and all construction equipment for all phases of the project.

6-01

Mitigation Measures

If the project is determined to have a significant impact on regional and/or local air quality, the DEIR should include all feasible mitigation measures.

6-02

If you have any questions, please call me at (805) 645-1426.

Sincerely,



Alicia Stratton
Planning and Monitoring Division

C: Jijaya Jammalamadaka, Santa Barbara County APCD

July 27, 2006

Eric Gillies, Staff Environmental Scientist
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825

Dear Mr. Gillies

Subject: Santa Barbara County Fire Department Comments
Proposed Venoco, Inc. Expansion Project

Santa Barbara County Fire Department's Fire Prevention Division (FPD) has reviewed the June 28, 2006 document titled *Notice of Preparation of a Draft Environmental Impact Report and Notice of Public Scoping Meeting* submitted by the California State Lands Commission. The document presents a proposal by Venoco, Inc. to extend the oil and gas lease boundaries of PRC 3120.1 and 3242.1 to fully develop the oil reserves, provide for safety improvements and upgrades at the existing Ellwood Onshore Facility (EOF), and eliminate all operations at the Ellwood Marine Terminal (EMT) by the installation of a new onshore pipeline route system.

Section 1.4.5 of the document states "the approximate 1,103-foot long 6-inch pipeline Venoco segment connecting Line 96 to the EMT would be removed, and the remainder of Line 96 between the EMT and EOF would be isolated and left in place." FPD requires an assessment along all pipelines, whether removed or left in place. Prior to removal or abandonment in place, a workplan for assessment must be submitted to FPD for approval. The workplan shall include details of the proposed sampling methodology, sampling frequency and a list of analytes.

7-01

Section 1.4.5 of the document further states, "After tank removal, a Phase I and Phase II site assessment would be conducted to determine the presence and extent of contamination. Any necessary remediation of the underlying soil would take place, based on this assessment, along with removal of foundations, pipe supports, and other substructures." All assessment and remediation shall be conducted in accordance with FPD's requirements. Prior to the dismantling and removal of the EMT and any other oilfield infrastructure, a workplan for assessment must be submitted to FPD for approval. The workplan shall include a detailed site map, specific areas to be assessed, methodology for assessment, and a proposed list of analytes for soil and groundwater samples.

7-02

Should you have any questions regarding the aforementioned, please contact the undersigned at (805) 686-8140. Written correspondence should be sent to 195 West Highway 246 #102, Buellton, California 93427, or faxed to (805) 686-8183.

Respectfully,

Joshua Neipp
Hazardous Materials Specialist

FPD comments - Venoco Ellwood project



July 28, 2006

Mr. Eric Gillies, Staff Environmental Scientist
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825
gilliee@slc.ca.gov

**Re: Ellwood Oil Development and Pipeline Project – Notice of
Preparation of a Draft Environmental Impact Report**

Dear Mr. Gillies,

The following comments are submitted by the Environmental Defense Center (“EDC”) on behalf of the Sierra Club, Get Oil Out!, Citizens Planning Association of Santa Barbara County, and Citizens for Goleta Valley, regarding the scope of environmental review for the proposed Ellwood Oil Development and Pipeline Project (“Ellwood Project”). EDC and our clients are active in issues relating to offshore oil and gas development and have been monitoring Venoco’s plans to expand its Ellwood operations since 2000. Our comments on the scope of environmental review for this project focus on the need for an accurate and complete description of the environmental and regulatory setting, a full assessment of the impacts associated with the project as well as the proposal to extend the life of existing facilities and infrastructure, and an analysis that includes an adequate range of alternatives.

1.2 PROJECT OBJECTIVE

The project objective is much too narrowly presented. As written, the objective reads more like a summary of the project description than a statement of the underlying purpose of the project as required by CEQA Guidelines §15124(b). An unduly narrow

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project objective will constrain the range of project alternatives, in violation of CEQA.¹ In this case, the objective of the project is to provide a supply of energy and should be stated accordingly.

8-01 cont.

1.3 SETTING

In order to properly inform the public and decision-makers, it is critical that the Draft EIR include a complete description of the complicated regulatory background for this proposal. This project is not proposed in a vacuum; there is a long history that affects the legality and suitability of Venoco's plans, as stated herein.

Platform Holly

Perhaps most significantly, the Draft EIR must disclose the fact that Venoco's predecessor in interest, ARCO, attempted to develop this exact same field in the 1980's. At that time, ARCO proposed to develop the field through the construction of new platforms. The project engendered tremendous opposition from the community and UCSB, and was denied by the County of Santa Barbara, Santa Barbara County Air Pollution Control District and the State Lands Commission. ARCO challenged the denials in Court, and Sierra Club intervened on behalf of the County and State. The lawsuit was ultimately resolved through a settlement agreement that provided for ARCO to quitclaim the leases in question (Leases 308 and 309) in exchange for additional drilling rights off the coast of Long Beach. The settlement agreement was executed in November, 1991, and ARCO subsequently reaped the benefit of the agreement by developing oil and gas reserves in Long Beach.

8-02

Venoco now seeks to develop the same area, despite the fact that ARCO's agreement is binding on successors and assigns. See attached *Agreement for Implementation of an Optimized Waterflood Program for the Long Beach Unit*. We believe that allowing Venoco to drill into this area would violate the spirit and intent, not to mention the plain language, of the 1991 settlement agreement. It was certainly Sierra Club's intention, as a party to the agreement, that this area be off limits to future oil and gas development.

This intention was supported further when the State Legislature passed AB 2444 in 1994, declaring all unleased areas in state waters to be part of the California Coastal

¹ *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 735-737 [270 Cal.Rptr. 650]; *Rural Land Owners Association v. City Council* (1983) 143 Cal.App.3d 1013, 1024-1025 [192 Cal.Rptr. 325]; *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1455 [263 Cal.Rptr. 340]; *County of Inyo v. City of Los Angeles* (1981) 124 Cal.App.3d 1, 9 [177 Cal.Rptr. 479]; see also *Save the Niobara River Association, Inc. v. Andrus* (D.Neb. 1977) 483 F.Supp. 844 (EIS inadequate for failure to consider water conservation as an alternative to construction of a dam and reservoir).

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Sanctuary and banning oil and gas leasing in such areas.² The area in which Venoco proposes to develop is now part of the California Coastal Sanctuary.

We recognize that separate state legislation, which was adopted in 1991 and became effective in 1992, allows for the adjustment of a State lease boundary if the field within the existing lease extends beyond the boundary.³ However, such an adjustment is discretionary. In a case such as this one – where the State and lessee executed an agreement to quitclaim the leases that encompass the exact same area proposed for development in exchange for a benefit realized by the prior lessee – discretion should weigh in favor of upholding the settlement agreement and prohibiting the boundary adjustment and development of this area.

8-02 cont.

Ellwood Onshore Facility

Similarly, it is critical that the Draft EIR disclose the previous attempts to phase out the Ellwood Onshore Facility (“EOF”). Like Platform Holly, this facility was built in the 1960’s and has become outdated, both in terms of technology but also in terms of compatibility with the surrounding region. The EOF is now surrounded by a public golf course, high-end resort, public beach, and residential development.

The Draft EIR should include the history of the EOF as well as the offshore leases. In 1985, an initiative was placed on the ballot by the citizens of Santa Barbara County. This measure would have required all oil companies operating on the South Coast to consolidate their onshore processing operations at one site, Las Flores Canyon. The County placed a counter-measure on the ballot that proposed two sites, Las Flores Canyon and a new site at Gaviota. Based on the election results, the County adopted a South Coast Consolidation Policy that designated these two locations as appropriate for oil and gas processing, and in 1990 rezoned all other onshore processing facilities to other uses. The EOF site was re-zoned for Recreational uses and the Ellwood Marine Terminal (“EMT”) site was re-zoned for Residential uses.

8-03

Since 1990, then, the EOF has been operated as a legal non-conforming use. The purpose and intent of a non-conforming use is to allow the owner to continue with the use as it was permitted under the prior zoning, but to convert the area to its conforming use as soon as such use is completed. No expansion or extension of a non-conforming use is allowed, absent minor safety or environmental modifications.

The Draft EIR must disclose whether Venoco’s plans for expanded production violate the current general plan designation and zoning for the EOF and whether a general plan amendment and re-zone back to an Industrial designation is required. This issue goes to the legality of the project and must be determined up front, before environmental review is conducted.

² California Public Resources Code §6240 et seq.

³ California Public Resources Code §6872.5.

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The Draft EIR should also disclose the fact that the County of Santa Barbara considered the possibility of requiring an earlier shut-down of the EOF through an amortization ordinance. A non-conforming use may be amortized, or phased out, before the conclusion of its operations so long as the operators retain a reasonable return on their investment. The Draft EIR should disclose the results of the County's amortization study, which concluded that it was legally possible to phase out this use and require conversion of the EOF to a conforming use. The County was in the process of performing a financial analysis to determine exactly when the conversion could occur when the City of Goleta incorporated and assumed jurisdiction. This history is important for the decision-makers to be aware of when considering a proposal that would significantly extend, not phase out, the EOF.

8-03 cont.

Ellwood Marine Terminal

As noted above, the EMT was also re-zoned in 1990, to Residential use. The Draft EIR should disclose this re-zone, again to inform the public and decision-makers that there was an effort made 16 years ago to phase out this non-conforming, incompatible industrial use.

In addition, the Draft EIR should point out that the EMT is operating on an expired lease from the State Lands Commission. The most recent lease was issued for a 10-year period beginning March 1, 1983, with two renewal options of 10 years each. The lease was not renewed in 1993, and the EMT has been operating on a month-to-month extension since that time. In approximately 2004, Venoco notified the SLC "that it wishe[d] to exercise its *last 10-year lease renewal option, as provided in the lease, until February 28, 2013.*"⁴ (Emphasis added.) Therefore, the life of Venoco's existing operations will expire, at most, seven years from the present and 3-5 years after the initiation of the proposed new development project.⁵

8-04

1.4 PROJECT COMPONENTS

Life of the Project

The Draft EIR should disclose the expected life of the proposed project. This analysis is especially critical, given the fact that Venoco would be operating facilities that are already 40 years old. Although the NOP states that wells will be drilled through 2030, it does not state how long production will occur.

8-05

⁴ *Notice of Preparation (NOP) Scoping Document, Proposed Ellwood Marine Terminal Lease Renewal, Environmental Impact Report (EIR) (Industrial Lease PRC 3904.1)*, July 14, 2004.

⁵ In addition, the storage tanks that support the EMT operations are on UCSB property, and are permitted under a lease that expires in 2016. The University has publicly stated that it does not intend to extend the lease beyond 2016.

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Lease 421

According to CEQA, an EIR must address the “whole of the project;” piecemeal review is not allowed.⁶ We note that there are two other related projects undergoing environmental review at the same time as the Ellwood Project – the Lease 421 Recommissioning Project and the Ellwood Marine Terminal Lease Renewal project. Production from Lease 421 would utilize some of the same facilities as the Ellwood Project and should be included in the same EIR. If these projects are not at all related, then the Lease 421 project should at least be included in the assessment of cumulative impacts.

8-06

1.4.1 Lease Extensions

See discussion above regarding ARCO’s quitclaim of Leases 308 and 309, and the ensuing adoption of the California Coastal Sanctuary. The proposed project would allow development within the Sanctuary, in direct contradiction to the settlement agreement that was forged between ARCO, the State, the County and the Sierra Club.

8-07

1.4.2 EOF Operations

See discussion above regarding the re-zone of this site to Recreational use, and the need to determine whether the project can legally proceed under this zoning.

8-08

1.4.5 Decommissioning

The Draft EIR should disclose the fact that the EMT lease will expire no later than 2013. According to the NOP, the Ellwood Project would commence operations between 2008 and 2010 (most likely closer to 2010, given the need to obtain approvals from the City, County, State Lands Commission and Coastal Commission, and then construct the project components). Although Venoco claims that the project will provide a benefit by removing the EMT, in fact the EMT would be removed within a few years anyway.

8-09

The Draft EIR should analyze the impacts that can arise during decommissioning. The EIR should cite to Chevron’s 4-H Platform removal project as evidence that oil companies do not necessarily clean up all of the debris around platforms upon removal, and that the debris contains highly toxic hydrocarbons, PCBs, and heavy metals. The Draft EIR should include enforceable measures to ensure complete clean up and restoration of the site.

⁶ CEQA Guidelines §15378(a); *Burbank-Glendale-Pasadena Airport Authority v. Hensler* (1991) 233 Cal.App.3d 577, 592 [284 Cal.Rptr. 498]; *Bozung v. Local Agency Formation Commission* (1975) 13 Cal.3d 263, 283-284 [118 Cal.Rptr. 249].

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4.0 ALTERNATIVES

The current range of alternatives proposed in the NOP is woefully inadequate. In addition to the No Project alternative (which is mandatory under CEQA), the only real alternative is 4.1.5. This alternative would bypass the EOF and transport oil emulsion through a new offshore pipeline to the Las Flores Canyon consolidated processing facility. The NOP states that this alternative, which is the only alternative that complies with the South Coast Consolidation Policy, is predicated upon the ability to use the Las Flores Canyon facility for the Ellwood Project. The Draft EIR should note that as part of Exxon's approval to operate the Las Flores Canyon facility, Exxon is *required* to make the facility available to other users. Specifically, Condition VII-I of Exxon's permit states the following:

"VII-1. Consolidation and Co-location

ExxonMobil shall make its facilities and property available for consolidation and co-location of oil and gas facilities on a non-discriminatory and equitable basis. County retains the right to verify that the use of the facilities and property is conforming with County policies regarding consolidation and to impose additional permit conditions where necessary to assure these policies are being fulfilled.

Consistent with the approved policy resolution regarding the consolidation of oil and gas processing facilities, in the event that the need for such facilities is demonstrated by other developers to the Planning Commission, ExxonMobil shall make available to such other developers any excess capacity of the SYU project facilities. In the event that sufficient excess capacity does not exist within the SYU project facilities to serve the needs of such other developers as demonstrated to the Planning Commission, ExxonMobil shall make its Las Flores/Corral Canyon property available to other developers for the construction of additional permitted oil and gas-related facilities. In the event that such necessary facilities are not permissible pursuant to the County's consolidation policies, ExxonMobil shall reduce its throughput on a pro-rata basis to accommodate such other developers.

The intent of this condition is to ensure the efficient and maximum use of oil and gas-related facilities in order to avoid the construction of redundant facilities.

VII-2. Terms for Shared Facility Use

Prior to approval of the Final Development Plan and at any time thereafter, as requested by the County, ExxonMobil shall submit to the Director of the Planning and Development Department terms, including financial terms,

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under which other producers in the area would be permitted to enter and use either the facilities or property in the canyons for oil and/or gas processing or storage facilities, or ancillary facilities including but not limited to electrical substations, power generating facilities, water treatment facilities, wastewater loading facilities, and NGL/LPG loading facilities. ExxonMobil shall submit the requested information to the Director of the Planning and Development Department within thirty (30) days of such request or by a date mutually agreed upon by ExxonMobil and the Director of the Planning and Development Department. If these terms are determined to be unacceptable to potential users of the facility and if agreement cannot be reached, the County shall reserve the right to impose additional conditions as described above to amend the permit. The intent of this condition is to ensure the efficient and maximum use of oil and gas transportation and processing facilities. (*Modified May 4, 1994; II-2 Review*)”

8-10 cont.

Therefore, this Alternative deserves full consideration in the Draft EIR.

Alternative 4.1.1 is not an alternative at all; it is just a regulatory mechanism to make the project legally viable if the non-conforming status of the EOF prevents Venoco from using that facility. As stated above, the City needs to make a determination up front as to whether a re-zone and general plan amendment are required, as that requirement must then be included in the project description.

8-11

Alternatives 4.1.2, 4.1.3, and 4.1.4 are all minor variations of the proposed project and do not rise to the level of providing the decision-makers with a valid choice of alternatives.

8-12

The Draft EIR must include additional alternatives to meet the CEQA requirement that a *reasonable range* of alternatives must be analyzed in an EIR.⁷ As stated above, the project objective should be presented more broadly to reflect the underlying purpose of the project, which is to provide a supply of energy. Accordingly, other energy alternatives should be included that are capable of providing the same supply while avoiding or reducing project impacts. Energy conservation, efficiency and renewable sources (e.g., wind, solar, biomass, geothermal) should be included in the document.

8-13

4.1.2 No Project Alternative

To ensure an adequate comparison, the Draft EIR should assess this alternative on the basis that current operations must cease no later than 2013.

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⁷ CEQA Guidelines §15126.6(a); *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 566 [276 Cal.Rptr. 410]; *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376 [253 Cal.Rptr. 426].

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5.1 ENVIRONMENTAL ISSUE AREAS

EDC and our clients have two overarching concerns about the analysis of environmental impacts in the Draft EIR. First, the proposed project would extend the life of existing impacts, from 2013 to 2030 or beyond. The extension of these impacts must be adequately and fully disclosed. **8-15**

Second, the project would rely on the continued use of aging facilities that are already operating longer than initially anticipated. Extending the use of aging facilities (e.g., Platform Holly, offshore and onshore pipelines, and the EOF) raises significant concerns regarding potential leaks, corrosion, and lack of state-of-the-art equipment. The Draft EIR should provide a thorough evaluation of the state of the existing facilities and whether they can be safely operated for another 25 or 30 years, in addition to the 40 years they have already been in operation. **8-16**

The Draft EIR should disclose the safety and incident history associated with these facilities. In particular, the EIR should discuss the leaks at Platform Holly that led the State to shut down operations in 1999. The EIR should also discuss the 1994 pipeline leak and oil spill under Sandpiper Golf Course. **8-17**

5.1.2 Air Quality

The Draft EIR should disclose what offsets will be required to permit this project, whether they are available, and how allocation of such offsets to this project may impact other competing projects in the affected region that need offsets. **8-18**

The air pollution impacts of the increased electrical generation should be disclosed. **8-19**

The Draft EIR should include a calculation of greenhouse gas (GHG) emissions from the proposed project. With the growing scientific consensus that not only is global warming real, but it may be irreversible if we don't reduce GHG emissions immediately, the public and decision-makers have a right and need to know how much this project will send us in the wrong direction. The Draft EIR should analyze the project's consistency with the State's goals for reducing GHG emissions, the Kyoto Treaty, and any other relevant policies that address global warming and the means to reverse the current trajectory of climate change. In providing this analysis, the calculation of GHG emissions should include the full supply chain of the project, including extraction and production, processing, transportation, and consumption. **8-20**

The Draft EIR should include public health effects from air pollution, including asthma and other respiratory ailments. **8-21**

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The Draft EIR should analyze the odors that will be generated from the project, and the resulting impacts on human health, quality of life, and enjoyment of coastal recreational resources.

8-22

5.1.3 Biological Resources

The NOP provides an improperly narrow identification of “Significance Criteria” for impacts to Biological Resources. According to CEQA Guidelines §15065,

“A lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where any of the following conditions occur:

- (a) The project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number *or restrict the range* of an endangered, *rare* or threatened species....” (Emphasis added.)

8-23

Accordingly, the Draft EIR should analyze any impacts to the range (not just population) of threatened, endangered or candidate species, and must consider impacts to all rare species, not just listed or candidate species.

8-24

The Draft EIR should consider impacts to creeks and other environmentally sensitive coastal habitats.

The Draft EIR should consider the impacts that would be caused by an oil spill. The analysis in the EIR should be predicated on a worst case scenario, given the fact that only 5 – 15% of an oil spill is usually recovered and cleaned up. As the County learned from the Torch oil spill in 1997, it does not matter how effective plans may appear on paper, or how much training is provided to oil workers; spills will happen, operators will make mistakes, and response will be delayed and incomplete.

8-26

The Draft EIR should consider the impacts of noise on marine mammals, fish and other wildlife.

8-27

5.1.4 Energy

The California Energy Action Plan includes a prioritization of energy sources for our State. The first priority is energy efficiency, followed by reducing demand (conservation), then renewables, before other options. The Draft EIR should analyze the project’s consistency with State energy policy.

8-28

5.1.7 Hazards and Hazardous Materials

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See comments above regarding oil spills. The Draft EIR should also disclose the significant adverse impacts that oil spill cleanup activities pose to the environment (e.g., through the use of chemical dispersants and in-situ burning; introduction of heavy equipment and vehicles in environmentally sensitive areas; and impacts of hot water washes on biological resources). In addition, the Draft EIR should analyze the health impacts of oil spill clean-up on workers.⁸

8-29

The Draft EIR should disclose the impacts of accidental gas releases on the environment and human health.

8-30

5.1.8 Water Quality

The Draft EIR should consider impacts from accidental discharges, leaks and spills.

8-31

5.1.9 Land Use

As stated above, the Draft EIR must disclose the current general plan and zoning designations of the EOF and analyze the non-conforming status of the facility.

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In the discussion of Recreational impacts, the DEIR should note the recent acquisition of Ellwood Mesa (the “Sperling Preserve”). The DEIR should note the visual effects of Platform Holly on the use and enjoyment by the public of adjacent coastal areas including the Sperling Preserve, Sandpiper Golf Course, Haskell’s Beach, Devereux/Coal Oil Point, the beach from Campus Point to Naples, and ocean users (including swimmers, kayakers, and fishers).

8-33

The Draft EIR should analyze the project’s consistency with not only current policies and regulations that apply to the project, but also draft policies under consideration by the City of Goleta.

8-34

5.0 CUMULATIVE IMPACTS

The Draft EIR should include the following existing and proposed oil and gas development projects: the 37 federal undeveloped offshore leases, resumption of production from Platform Grace, Carone, Paredon, Lease 421, Tranquillon Ridge, and onshore projects. The Draft EIR should also consider LNG proposals in the area and, in terms of Energy impacts, those LNG projects that would potentially provide natural gas to the State.

8-35

⁸ See Sound Truth and Corporate Myth, by Dr. Riki Ott, for a comprehensive analysis of the short- and long-term impacts of oil spills and clean-up efforts.

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The Draft EIR should analyze the various state and federal proposals for “rigs-to-reefs” as part of its review of decommissioning impacts. Such proposals threaten to negatively impact the marine environment by (1) potentially attracting fish away from productive natural reefs; and (2) leaching contaminants from corroding structures and debris left behind.

8-36

Finally, the Draft EIR should analyze cumulative impacts on air quality and global warming.

8-37

CONCLUSION

We urge the State to ensure that the Draft EIR for this project provides an adequate understanding of the background and setting for the proposal, and a complete analysis of impacts, mitigation measures and alternatives. Thank you for this opportunity to comment on the scope of the Draft EIR for the Ellwood Project.

Sincerely,

Linda Krop
Chief Counsel

Att: *Agreement for Implementation of an Optimized Waterflood Program for the Long Beach Unit*

cc: City of Goleta
County of Santa Barbara
California Coastal Commission
Sierra Club
Get Oil Out!
Citizens Planning Association
Citizens for Goleta Valley